



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Attachment C



OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Request for Assistance - Reilly Tar

FROM: Christopher Capper, Acting Assistant Administrator
Office of Solid Waste and Emergency Response

TO: Courtney Riordan, Acting Assistant Administrator
Office of Research and Development

I am requesting the assistance of EMSL/Las Vegas on our enforcement case against Reilly Tar and Chemical Company for its former operation in St. Louis Park, Minnesota. We will need an expert witness to testify on the validity of the analytical methods and on the quality control procedures used to analyze the samples taken. The Minnesota Department of Health (MDH) modified EPA method number 610 (see attachment) in order to measure polynuclear aromatic hydrocarbons at parts per trillion, and their modifications need to be validated.

In addition to MDH, samples were analyzed at four other labs in the Minneapolis area. We should check quality control procedures at these labs. In discussions with Gene Meier of EMSL, he estimated this work will take from one to two man-months. This work is very important to the case, and even though trial may be several months away, it is necessary to have an independent assessment of our analytical data as soon as possible.

If you have any questions, please contact Mike Kosakowski of my staff at 382-3118.